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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

The Spearmint Rhino Companies Worldwide,  
Inc. and K-Kel, Inc.,

Plaintiffs,

vs.

Chang's Dynasty LLC and Alan Chang,

Defendants.

Civil Action No. 2:23-cv-02040-ART-BNW

Honorable Anne R. Traum  
Magistrate Judge Brenda Weksler

**ORDER GRANTING**

**JOINT MOTION TO EXTEND THE  
GRANTED STAY FOR TWENTY-ONE  
DAYS**

Current end of stay: May 12, 2025  
Requested new end of stay: June 2, 2025

1 Plaintiffs The Spearmint Rhino Companies Worldwide, Inc. and K-Kel, Inc.  
 2 (“Plaintiffs”) and Defendants Chang’s Dynasty LLC and Alan Chang (“Defendants”)  
 3 (collectively, “the Parties”) hereby respectfully and jointly move the Court for a twenty-one  
 4 (21) day extension to the stay of proceedings previously granted by the Court. (Dkt. 43.) An  
 5 extension to the granted stay is warranted because the Parties are continuing to negotiate a  
 6 settlement agreement to resolve this litigation. An initial draft of the settlement agreement has  
 7 been exchanged but the details of the specific terms have been complicated and negotiations of  
 8 those terms require additional time.

9 The Parties submit that an additional 21-day stay in this litigation would assist the  
 10 Parties to focus their efforts on preparing a final settlement agreement. The Parties are  
 11 optimistic that they will be able to continue working together in good faith to reach a final  
 12 agreement. In the event a final settlement agreement is not reached, the Parties will jointly  
 13 submit a proposed amended scheduling order at the conclusion of the stay. Accordingly, the  
 14 Parties hereby jointly request an extension of the stay of the present litigation for an additional  
 15 twenty-one (21) days in the interest of the Parties’ and judicial efficiency while discussions  
 16 continue toward reaching a final settlement agreement. Good cause exists to grant this request  
 17 as the Parties do not seek the extension to the stay requested herein for delay but instead seek  
 18 to stay all proceedings in the interest of efficiency and judicial economy.

19  
 20 Dated: May 9, 2025

STRADLING YOCCA CARLSON & RAUTH LLP

21 By: /s/ Douglas Q. Hahn  
 22 Douglas Q. Hahn

23 WOMBLE BOND DICKINSON (US) LLP  
 24 Meng Zhong, Esq.  
 Ogonna M. Brown, Esq.

25 *Attorneys for Plaintiffs The Spearmint Rhino*  
 26 *Companies Worldwide, Inc. and K-Kel, Inc.*

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MAXWELL GOSS PLLC

By: /s/ Maxwell Goss  
Maxwell Goss

RANDAZZA LEGAL GROUP

Marc J. Randazza  
Ronald D. Green

*Attorneys for Defendants  
Chang's Dynasty LLC and Alan Chang*

**IT IS SO ORDERED**



ANNE R. TRAUM  
UNITED STATES DISTRICT JUDGE

DATED: May 14, 2025